

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION

JANET DEXTER
on behalf of herself and all
others similarly situated,

Plaintiff,

Case No. 20-cv-1441

v.

CARDINAL RIDGE RESIDENTIAL CARE, LLC

Defendant

PLAINTIFF'S MOTION FOR APPROVAL OF ATTORNEYS' FEES AND COSTS

COMES NOW Plaintiff, Janet Dexter, on behalf of herself and all others similarly situated, by and through counsel, WALCHESKE & LUZI, LLC, and hereby respectfully Motions this Court for Approval of Attorneys' Fees and Costs on the grounds set forth herein, in Plaintiff's supporting Brief, and in the accompanying Declarations.

1. Plaintiff's counsel has achieved substantial and considerable success in this matter – a Fair Labor Standards Act (FLSA) Collective and a Wisconsin Wage Payment and Collection Law (WWPCL) Class – on behalf of current and former employees of Defendant, Cardinal Ridge Residential Care, LLC, by negotiating a fair and reasonable settlement of this matter with Defendant's counsel, the terms of which are embodied in the parties' executed settlement agreement, (ECF No. 19-1), and preliminarily approved by this Court. (ECF No. 22);

2. In accordance with the agreed-upon terms of the parties' Settlement Agreement, Plaintiff's counsel motions this Court for approval of attorneys' fees and costs in the total amount of \$12,500.00, which represents (and is actually less than) Plaintiff's counsel's

attorneys' fees and costs litigating and resolving this matter to date. (ECF No. 19-1, ¶ 3.2);

3. Defendant does not oppose Plaintiff's counsel's Motion for Approval of Attorneys' Fees and Costs in the total amount of \$12,500.00. (*Id.*); and

4. Plaintiff's counsel's requested attorneys' fees and costs are fair, reasonable, and representative of and consistent with the rates of other attorneys in the community and approved in similar matters before this Court in multi-plaintiff FLSA collective and WWPCL class cases.

WHEREFORE, Plaintiff respectfully requests that this Court grant her Motion for Approval of Attorneys' Fees and Costs in the total amount of \$12,500.00 as set forth herein.

Dated this 26th day of July, 2021

WALCHESKE & LUZI, LLC
Counsel for Plaintiff

s/ *Scott S. Luzi*

Scott S. Luzi, State Bar No. 1067405

WALCHESKE & LUZI, LLC
235 N. Executive Drive, Suite 240
Brookfield, Wisconsin 53005
Telephone: (262) 780-1953
Fax: (262) 565-6469
E-Mail: sluzi@walcheskeluzi.com